



**Chairperson: Bob Wyatt, NW Natural**  
**Treasurer: Fred Wolf, Legacy Site Services for Arkema**

March 5, 2009

Chip Humphrey  
Eric Blischke  
U.S. Environmental Protection Agency, Region 10  
805 SW Broadway, Suite 500  
Portland, OR 97205

**Re: Invertebrate Tissue – Residue Toxicity Reference Values for the Baseline Ecological Risk Assessment (Lower Willamette River, Portland Harbor Superfund Site, USEPA Docket No: CERCLA-10-2001-0240)**

Chip and Eric:

Thank you for your February 18, 2009 letter, in which you directed the Lower Willamette Group (LWG) to include the Dillon et al. (1990) and Fowler et al. (1978) studies in the invertebrate tissue-residue TRV for PCBs. The LWG will comply with this directive. However, as you acknowledged in your February 18 letter, we disagree on technical grounds with the inclusion of these two studies because we do not believe they meet the requirements of the TRV development methodology that was agreed upon by EPA, its partners and the LWG. The TRVs proposed by the LWG were developed using the agreed-upon methods and are adequately protective of ecological receptors in the Willamette River. Although we will comply with the directive we do not agree that these studies are warranted for inclusion in the development of invertebrate tissue-residue TRVs for PCBs.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bob Wyatt", is written over a light blue horizontal line.

Bob Wyatt

cc: Confederated Tribes and Bands of the Yakama Nation  
Confederated Tribes of the Grand Ronde Community of Oregon  
Confederated Tribes of Siletz Indians of Oregon  
Confederated Tribes of the Umatilla Indian Reservation  
Confederated Tribes of the Warm Springs Reservation of Oregon  
Nez Perce Tribe  
Oregon Department of Fish & Wildlife

United States Fish & Wildlife  
Oregon Department of Environmental Quality  
LWG Legal  
LWG Repository